UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

JANE DOE,)
Plaintiff,) Case No.: 5:18-cv-01100-BKS-TWD
v.)
SYRACUSE UNIVERSITY,) MOTION TO WITHDRAW AS) COUNSEL OF RECORD)
Defendant.)

Pursuant to Local Rule 83.2, Park Legal Counsel Group, PLLC ("Movant") hereby notifies the Court and the parties of its intent to withdraw as counsel for Plaintiff. Movant states the following grounds for this notice and motion:

- Movant has experienced irreconcilable differences with its client Jane Doe regarding
 Movant's further representation even though Movant clearly explained to Jane Doe
 regarding the limited scope and time of representation and further schedules in this case
 since the Defendant's motion to dismiss the complaint was filed against her.
- 2. Jane Doe has been given additional time to respond to the Defendant's motion to dismiss the complaint. Jane Doe's response due date has been extended to December 28, 2018 and Defendant's reply to January 7, 2019. A hearing on the motion will be scheduled if deemed necessary by the Court. This withdrawal motion will not cause any prejudice or delay to the parties in this case. Jane Doe has at all times been informed and aware of the motion

and the limited scope of Movant's representation and the need for Plaintiff to obtain new

representation.

WHEREFORE, Movant requests respectfully that this Court grant Park Legal Counsel

Group, PLLC leave to withdraw as counsel in the above-captioned matter, and enter an order

stating that Movant has so withdrawn.

Dated: December 3, 2018

Respectfully Submitted,

Park Legal Counsel Group, PLLC

By: /s/ Joon H. Park

Joon H. Park (NDNY 700423)

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Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

I do hereby certify that I have on December 3, 2018 electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of filing to counsel of record.

/s/ Joon H. Park
Joon H. Park

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

JANE DOE,)
Plaintiff,) Case No.: 5:18-cv-01100-BKS-TWD
v.))
SYRACUSE UNIVERSITY,) [PROPOSED] ORDER GRANTING) MOTION TO WITHDRAW AS) COUNSEL FOR PLAINTIFF)
Defendant.	
Park Legal Counsel Group, PLLC seeks to	o withdraw as counsel for Plaintiff in the above-
captioned litigation pursuant to Local R. 83.2.	As this Court finds that Movant has submitted
satisfactory reasoning for withdrawal, and that the granting of this Motion will not cause	
substantial prejudice or delay to any party,	
IT IS HERELY ORDERED that Park Leg	al Counsel Group, PLLC's Motion to Withdraw
as Counsel for Plaintiff is GRANTED, and same l	aw office is hereby terminated as counsel in this
proceeding.	
DATED:	By: Hon. Brenda K. Sannes United States District Court